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Applicants: Jin-Ho Ha, Hee-June Kwak
Title: Liquid Crystal Display Device And Method For Assembling The Same
Application No.: 09/850,367 **Filing Date:** May 8, 2001
Examiner: Hoan C. Nguyen **Group Art Unit:** 2871
Docket No.: AB-1663 US **Confirmation No.** 2543

Irvine, California
November 21, 2006

Via Facsimile to (571) 273-8300

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Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

CERTIFICATION OF FACSIMILE TRANSMISSION

I hereby certify that the following documents are being facsimile transmitted to the U.S. Patent and Trademark Office on the date shown below:

- 1) Notice of Appeal Transmittal (1 page); and
- 2) Pre-Appeal Brief Request For Review (5 pages)

Dated: November 21, 2006


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Number of pages (including this sheet): 7

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Applicants: Jin-Ho Ha, Hee-June Kwak
Assignee: Samsung Electronics Co. Ltd.
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Serial No.: 09/850,367 Filing Date: May 8, 2001
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NOTICE OF APPEAL

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Sir:

Applicant hereby appeals to the Board of Appeals from the decision dated July 24, 2006 of the Primary Examiner. The items checked below are appropriate:

- ☒ An extension of time to respond to the final rejection is hereby requested for 1 month. Please charge the fee of \$120.00 to Deposit Account 50-2257.
- ☐ The Primary Examiner has indicated that Applicant's AMENDMENT AFTER FINAL mailed _____, of claim _____ will be entered.
- ☒ A Pre-Appeal Brief Request For Review is enclosed herewith.
- ☒ Notice of Appeal Fee: Please charge Deposit Account 50-2257 as follows:
☐ SMALL ENTITY \$250.00
☒ LARGE ENTITY \$500.00
- ☐ An Oral Hearing is Requested. Charge Deposit Account 50-2257 as follows:
☐ SMALL ENTITY \$500.00
☐ LARGE ENTITY \$1,000.00
- ☒ The Commissioner is authorized to charge Deposit Account No. 50-2257 for any fees required with this Communication that are not covered, in whole or in part, and to credit any overpayments to said Deposit Account 50-2257.

Customer No. 32605

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Saundra L. Carr
Saundra L. Carr

November 21, 2006
Date of Signature

Respectfully submitted,

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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Dear Sir:

In response to the Office Action mailed July 24, 2006, please enter the following remarks.

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Claims 34-42 and 50-52 are pending after amendment. Applicant respectfully requests reconsideration and reexamination of the pending claims. Applicant has filed this pre-appeal brief request for review in light of the following clear error in the July 24, 2006 final office action.

I. The drawings clearly show the features of the claims

The Office Action of July 24, 2006 ("the Office Action") alleges that the drawings do not show every element of the claims. Particularly, on page 2, the Office Action alleges that the figures do not show a printed circuit board disposed outside the mold frame (claims 34, 50, and 52), and do not show an opening of the mold frame exposing a center portion of the bottom surface of the bottom chassis (claim 36).

This is a clear error, since these features are each illustrated in the figures. For example, FIG. 4 shows a cross-sectional view illustrating the mold frame 600 assembled with bottom chassis 300, so that the rear surface of bottom chassis 300 is exposed through the opening in the bottom surface of the mold frame 600. Note that the bottom surface of the bottom chassis 300 is illustrated as being flush with the bottom of mold frame 600 in the example of FIG. 4. PCB 500 and PCB 400 are both illustrated as disposed outside the mold frame.

The Advisory Action of October 5, 2006 ("the Advisory Action") alleges that FIGS. 3 and 4 are inconsistent, and so the objection to the drawings should stand. However, there is no ambiguity as to the position of PCBs 400 and 500 as shown in FIG. 4: they are disposed outside mold frame 600. The Advisory Action admits that FIG. 4 illustrates PCBs 400 and 500 under bottom chassis 300. Therefore, the objection to the drawings based on the failure to illustrate a printed circuit board disposed outside the mold frame is clearly in error.

Further, with reference to FIG. 3, the specification notes:

The printed circuit board 500 (hereinafter, referred to as an inverter board) for supplying the power source and the printed circuit board 400 (hereinafter, referred to as an A/D board) for converting signals are mounted on the rear surface of the bottom chassis 300 which is exposed through the opening in the bottom surface of the mold frame 600.

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That is, the placement of printed circuit board 500 and printed circuit board 400 is on the surface of bottom chassis 300 that is exposed through the opening in mold frame 600. Thus, the allegation that FIG. 3 illustrates PCBs 400 and 500 placed directly on bottom chassis (on the side of bottom chassis 300 opposite mold frame 600) is in error. Since FIG. 3 is an exploded perspective view from the top, the only way to illustrate the positions of PCB 400 and PCB 500 is with an indication on the viewable side.

The Office Action also alleges that the drawings do not illustrate that the opening in the mold frame exposes a center portion of the bottom surface of the bottom chassis. However, this feature can be clearly seen in the examples of FIG. 3 and FIG. 4. Referring to FIG. 4, the opening of mold frame 600 exposes the center portion of bottom chassis 300 between the vertical and bent edge portions of bottom chassis 300. Since this feature is clearly shown in the figures, the contrary allegation in the Office Action is in error.

II. The Yamamoto and Takeishi references do not teach the elements of independent claims 34, 50, and 52

We first note that the Advisory Action introduces a broad definition of the term "receiving." However, even assuming that this definition is applied to the claims, the rejections are in error because the Yamamoto and Takeishi references do not teach the elements of independent claims 34, 50, and 52. In particular, neither Yamamoto nor Takeishi teach an LCD device having a bottom chassis receiving a display unit and a mold frame receiving the bottom chassis, where the bottom chassis has a bottom surface exposed through an opening in the mold frame, as well as a PCB disposed on the bottom surface. Each of the pending independent claims includes these features.

Turning first to Yamamoto, we note the following from the Office Action: display panel 11 of Yamamoto is identified as the display unit of the claims, element 25 of Yamamoto is identified as the bottom chassis, molding frame 18 of Yamamoto is identified as the mold frame, element 17 of Yamamoto is identified as the opening, and printed circuit board 15 of Yamamoto is identified as the printed circuit board.

Turning now to the figures of Yamamoto, it is clear that the above-identified elements do not have the claimed relationship, even using the suggested definition for the term "receiving." In Yamamoto, display panel 11 and element 25 (identified as the

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bottom chassis) are on opposite sides of molding frame 18. Yet, according to the claims, the bottom chassis receives the display unit, and the mold frame receives the bottom chassis. If the display of Yamamoto is positioned so that the bottom chassis "supports the weight or pressure of" the display unit (which it would do in the illustrated position), molding frame 18 would not be supporting the weight or pressure of element 25. The opposite would be true: element 25 would be supporting the weight or pressure of molding frame 18. On the other hand, if the display is positioned so that the molding frame 18 supports the weight or pressure of element 25 (i.e., by turning the display upside down), the bottom chassis would not support the weight or pressure of the display unit.

Further, it does not appear that any surface of element 25 would be exposed through opening 17 of mold frame 18. If it were, it would be the top surface shown in the figure. However, PCB 15 is attached to the other side of element 25.

Thus, the Office Action's assertion that Yamamoto teaches the above-referenced claim features is clearly in error. The above arguments apply to independent claims 34, 50, and 52, and to dependent claims 35-42 and 51 through their dependency. Thus, all rejections of the pending claims in view of the teachings of Yamamoto are clearly in error.

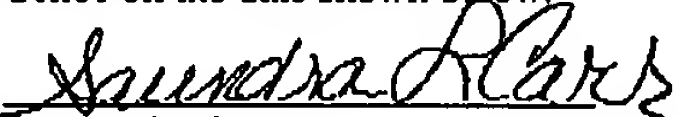
Turning next to Takeishi, we note the following from the Office Action and the Advisory Action: liquid crystal panel 11 of Takeishi is identified as the display unit of claim 34, front end 19a of Takeishi is identified as the bottom chassis, back light mold 24 of Takeishi is identified as the mold frame, and signal processing circuit board 13 is identified as the printed circuit board. As in Yamamoto, the above-identified elements of Takeishi do not have the above-noted relationship recited in the claims, even using the suggested definition for the term "receiving." First, liquid crystal panel 11 is on the opposite side of back light mold 24 from front end 19a, so that in a configuration where the bottom chassis receives the display unit, the mold frame is not receiving the bottom chassis. Conversely, if the liquid crystal display of Takeishi is positioned so that the mold frame is receiving the bottom chassis, the bottom chassis would not be receiving the display unit. Additionally, signal processing circuit board 13 of Takeishi is not disposed directly on a surface of front end 19a that is exposed through an opening in back light mold 24.

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The rejections of claims 34, 50, and 52 are thus clearly in error, since neither Yamamoto nor Takeishi teach or suggest the claimed configurations. Claims 34, 50, and 52, as well as their dependent claims 35-42 and 51, are thus patentable over Yamamoto and Takeishi.

CONCLUSION

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue, or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment. If the Examiner has any questions or concerns, a telephone call to the undersigned at (949) 752-7040 is welcomed and encouraged.

<p align="center">Certificate of Facsimile Transmission</p> <p>I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office on the date shown below.</p> <p> Sandra L. Carr Date of Signature: <u>November 21, 2006</u></p>

Respectfully submitted,


Linda G. Gunderson
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